



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133
Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

April 4, 2017

Mr. David Harrison
Pretreatment Coordinator
Town of Collierville
500 Keough Road
Collierville, TN 38017

Re: Pretreatment Technical Assistance Visit
 Collierville Sewage Treatment Plant
 NPDES Permit No. TN0057461
 Shelby County

Dear Mr. Harrison:

On Thursday, March 30, 2017, Mr. Eddy Bouzeid with the Division of Water Resources, Memphis Environmental Field Office (DWR/MEFO) conducted a Pretreatment Technical Assistance Visit (TAV) of the Collierville Publicly Owned Treatment Works. The purpose of a TAV is to review the status of the Town's pretreatment program. A TAV also provides an opportunity to answer questions that you might have or discuss any problems that the Town may be experiencing.

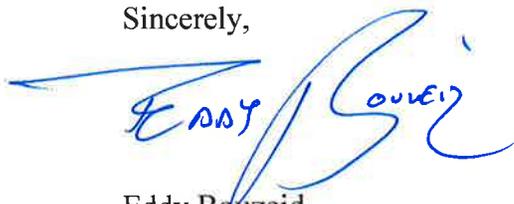
The TAV of Collierville's pretreatment program produced the following comments:

1. The Collierville pretreatment program includes six Industrial Users (IUs). Two (2) are Significant Industrial Users (SIUs) and four (4) Non-Significant Industrial Users. The two (2) SIUs are Carrier Corporation Metal Finishing and Carrier Corporation Water Remediation Plant. The four (4) NSIUs are McGinnis Oil (UST Remediation), Floratine Products (Custom Blend Fertilizer), and two (2) Carrier Corporation remediation sites.
2. Collierville, the Control Authority (CA), sampled and inspected all six (6) IUs during the evaluation period from April 2016 through March 2017.

3. The Semi-Annual Report (SAR) for the period from April 2016 through September 2016 was submitted on October 11, 2016. The SAR for the period from October 2016 through March 2017 has not been submitted as of the date of the inspection. The CA has until April 31, 2017, to submit the report.
4. The Legal Authority, the Sewer Use Ordinance (SUO) and the Enforcement Response Plan (ERP), and the revised Local Limits were approved by the DWR in Nashville on October 21, 2016. Subsequently, the CA placed the SUO and the ERP on Public Notice and received no comments. Proof of the Public Notice was submitted to Nashville and the Division had no objections. At of time of the TAV, the SUO and the ERP were given to the Mayor and the Board of Alderman for approval and adoption.
5. All the IUs were in compliance with their pretreatment discharge permits for the evaluation period from April 2016 through March 2017 except for Floratine Products. Floratine Products, a NSIU, had four (4) Zinc violations. The CA issued Notices of Violations for all violations and the IU submitted corrective action plans. The CA believes that once the Local Limits are approved and adopted, the Zinc concern will not be a problem since the Zinc concentration limit will change from 3.0 mg/l to 38.89 mg/l. The IU's Zinc exceedances ranged from 3.2-5.21 mg/l.
6. The biosolids from the CA's Wastewater Treatment Plants are hauled to a local landfill for land disposal.

The Division appreciates Mr. Harrison's cooperation and assistance during the inspection, and the Town's continuous efforts in complying with its pretreatment regulations. If you have any questions or comments, please contact me at eddy.bouzeid@tn.gov or 901-371-3023.

Sincerely,



Eddy Bouzeid
Environmental Protection Specialist
Division of Water Resources

cc: TDEC/DWR/NCO, Enforcement & Compliance,
TDEC/DWR/MEFO – File

ec: Tim Overly – Town of Collierville

POTW TECHNICAL ASSISTANCE VISITS CHECKLIST



CA name and address: Town of Collierville 500 Keough Road Collierville, TN 38017	Date(s) of TAV 3-30-2017 Period covered by TAV April 2016 –March 2017
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PIRT / DSS incorporated in NPDES permit?	Yes	No

INSPECTOR(S)		
Name	Title / Affiliation	Telephone Number
Eddy Bouzeid	EPS3/TDEC/DWR/MEFO	901-371-3023

CA REPRESENTATIVE(S)		
Name	Title / Affiliation	Telephone Number
David Harrison*	Collierville Pretreatment Coordinator	901-853-3219

*Identified program contact

ACRONYM LIST

Acronym

Term

BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U. S. Environmental Protection Agency
ERP	Enforcement Response Plan
FTE	Full - Time Equivalent
FWA	Flow - Weighted Average
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical Review Criteria
TTO	Total Toxic Organics
WENDB	Water Enforcement National Data Base

TECHNICAL ASSISTANCE VISIT EVALUATION COMMENTS

CA has six (6) Industrial Users (IUs). Two (2) are Significant Industrial Users (SIUs) and four (4) are Non-Significant Industrial Users (NSIUs).	
The two (2) SIUs are:	
<ol style="list-style-type: none"> 1. Carrier Corporation (metal finishing) 2. Carrier Corporation (water remediation plant) 	
The four (4) NSIUs are:	
<ol style="list-style-type: none"> 1. McGinnis oil (underground storage tank remediation site) 2. Floratine Products (custom blend fertilizer) 3. Carrier Corporation (groundwater remediation site-1) 4. Carrier Corporation (groundwater remediation site-2) 	
The CA sampled and inspected all six (6) IUs as required during the evaluation period.	
The Semi-Annual Report (SAR) required for the evaluation period April 2016 through September 2016 was submitted in October 11, 2016.	
The SAR required for the evaluation period from October 2016 through March 2017 has not been submitted. The CA has until April 30, 2017 to submit the report. According to Mr. Harrison, the report will be submitted before the required deadline.	
All the IUs were in compliance with their discharge permits for the evaluation period except for Floratine. Floratine had four Zinc violations during the reporting period from April 2016 through March 2017. Four notices of violations were issued. The IU submitted corrective action plans and the plans were approved. The CA believes that once the approved local limits are adopted, the Zinc concern will not be a problem for the IU. The Zinc concentration limit will change from 3.0 mg/l to 38.89 mg/l. Floratine Zinc violations ranged from 3.2 to 5.31 mg/l.	
The SUO, the Enforcement Response Plan (ERP) and the revised Local Limits were approved by Nashville. The SUO and the ERP were placed on public notice and received no comments. Proof of the public notice was submitted to Nashville and the Division had no objections. The SUO and the ERP were given to the Mayor and the Board of Alderman for approval and adoption.	
All discharge permits will be reissued once the SUO and local limits are adopted.	
The biosolids from the CA's WWTPs are hauled to a local landfill for land disposal.	

COMPLETED BY: Eddy Bouzeid	DATE: 3-30-2017
TITLE: EPS3	TELEPHONE: 901-371-3023
POTW REPRESENTATIVE	DATE: 3-30-2017
PROVIDING RESPONSES: David Harrison	TELEPHONE: 901-853-3219

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET		
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.		
CA name Town of Collierville		
NPDES number TN0057461		
Date of audit 3-30-2017		
	Checklist Reference	Data
• Number of SIUs*	II.B.2.a.	2
• Number of CIUs	II.B.2.a.	1
- Number of SIUs without control mechanism	II.C.1.a.	0
- Number of SIUs not inspected	II.E.2.b.	0
- Number of SIUs not sampled	II.E.2.a.	0
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	0
- Number of SIUs in SNC with Reporting Requirements	II.F.3.	0
- Number of SIUs in SNC with Pretreatment Schedule	II.F.3.	0
- Number of SIUs in SNC Published in the Newspaper	II.F.4.	0
- SIUs on Schedules	II.F.7.	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."		
**As defined in 40 CFR 403.8(f)(2)(viii).		

WENDB DATA ENTRY WORKSHEET	DATE: 3-30-2017
COMPLETED BY: Eddy Bouzeid	
TITLE: EPS3	TELEPHONE: 901-371-3023

RNC WORKSHEET

1. RNC WORKSHEET	
<i>INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.</i>	
CA name Town of Collierville	
NPDES number TN0057461	
Date of inspection 3-30-2017	Date entered into PCS
	Level
NA Failure to enforce against pass through and / or interference	I
NA Failure to submit required reports within 30 days	I
NA Failure to meet compliance schedule milestone date within 90 days	I
NA Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II
NA Failure to inspect or sample 80% of SIUs within the last 12 months	II
NA Failure to enforce pretreatment standards and reporting requirements	II
NA Other (specify)	II
SNC	
NA CA in SNC for violation of any Level I criterion	
NA CA in SNC for violation of two or more Level II criterion	
<p>For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</u></p>	

RNC WORKSHEET COMPLETED BY: Eddy Bouzeid TITLE: EPS3	DATE: 3-30-2017 TELEPHONE: 901-371-3023
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TAV IU FILE REVIEW

FILE <u> 1 </u> Industry name and address Carrier Corporation 97 South Byhalia Road Collierville, TN 38017		Type of industry Air Condition Manufacturer	
[x] CIU 40 CFR <u> 433 </u> , _____, _____ Category(ies) <u> Metal Finisher </u> _____		Contact name Ryan Adamson	Contact title Environmental Engineer
[] Other SIU [] Non SIU		Contact Phone 901-854-3131	
Comments			

CURRENT CONTROL MECHANISM (PERMIT)

EXPIRATION DATE OF LAST PERMIT		January 31, 2015	
PERMIT ISSUE DATE	Jan 31, 2015	PERMIT EXPIRATION DATE	Jan 31, 2020
<i>(< 5 YR DURATION)</i>			
COMMENTS	CA was advised that expiration date and permit reissuance should not overlap.		

PRETREATMENT STANDARDS VIOLATION HISTORY SINCE LAST INSPECTION

STANDARD VIOLATED	None	VIOLATION DATE	
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>			
ENFORCEMENT ACTION	No	DATE	
SIGNIFICANT NONCOMPLIANCE	NO	CHRONIC	TRC

STANDARD VIOLATED		VIOLATION DATE	
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>			
ENFORCEMENT ACTION		DATE	

SIGNIFICANT NONCOMPLIANCE		NO		CHRONIC		TRC	
STANDARD VIOLATED					VIOLATION DATE		
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>							
ENFORCEMENT ACTION					DATE		
SIGNIFICANT NONCOMPLIANCE		NO		CHRONIC		TRC	
STANDARD VIOLATED					VIOLATION DATE		
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>							
ENFORCEMENT ACTION					DATE		
SIGNIFICANT NONCOMPLIANCE		NO		CHRONIC		TRC	
STANDARD VIOLATED					VIOLATION DATE		
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>							
ENFORCEMENT ACTION					DATE		
SIGNIFICANT NONCOMPLIANCE		NO		CHRONIC		TRC	
STANDARD VIOLATED					VIOLATION DATE		
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>							
ENFORCEMENT ACTION					DATE		
SIGNIFICANT NONCOMPLIANCE		NO		CHRONIC		TRC	
STANDARD VIOLATED					VIOLATION DATE		
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>							
ENFORCEMENT ACTION					DATE		
SIGNIFICANT NONCOMPLIANCE		NO		CHRONIC		TRC	